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April 29, 2014

**VIA ECF**

The Honorable James C. Francis  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Varughese v. Mount Sinai Medical Center, et al.  
Docket No.: 12 Civ. 8812 (CM) (JCF)

Dear Judge Francis:

On behalf of our clients, Mount Sinai Medical Center and the individual defendants ("Defendants"), I write to inform the Court that, during the deposition of Dr. Adrienne Jordan, Plaintiff failed to provide Defendants with a number of exhibits and request that the Court direct Plaintiff to produce copies of all documents marked as exhibits at the deposition to counsel for Defendants by a date determined by the Court. In addition, Defendants request that the Court order that if Plaintiff fails to produce copies of the above-referenced documents by this date that she be precluded from using any of these documents for any purpose during this litigation.

Respectfully submitted,



Rory J. McEvoy

cc: Leena Varughese, M.D. (via ECF)  
Plaintiff